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From: Van Tol, Pieter [mailto:Pieter.VanTol@LOVELLS.com]
Sent: Monday, February 26, 2007 9:29 AM
To: Ken Feinberg; Sills, Robert L.; Craig, Gregory; William R. Jentes
Cc: Zeballos, Gonzalo; Fried, Lisa; Chang, Eric
Subject: RE: Attached Briefing Order
Importance: High

Confidential

Dear Chairman Feinberg and Members of the Tribunal:

We write in further response to the Tribunal's Briefing Order of February 12, 2007. We apologize for the slight delay in providing a follow-up response, but the Briefing Order raises some complex issues relating to Ukrainian law and practice which required us to consult extensively with our client and Ukrainian counsel.

After consulting with Ukrainian counsel, we have determined that a submission by Storm under the Briefing Order -- absent any other order from the Ukrainian court -- could be deemed a violation of the December 1, 2006 Ruling. At the same time, we are very anxious to assist the Tribunal in resolving the issues set forth in the Briefing Order, particularly since they relate to matters that Storm raised prior to the December 1 Ruling. We will be approaching the Ukrainian court in the next day or so for leave to make certain additional submissions to the Tribunal, as requested in the Briefing Order. However, it is unlikely that the Ukrainian court would issue any ruling on Storm's motion prior to the February 28, 2007 deadline for submissions set forth in the Briefing Order. It is our understanding that a ruling from the Ukrainian court probably would be made in relatively short order, but we simply cannot be sure of the timing.

Accordingly, we respectfully request a brief adjournment of the February 28 deadline in order to permit Storm to make its application and hear from the Ukrainian court. We suggest that the Tribunal order that any additional submissions shall be due within 5 business days of the ruling from the Ukrainian court on Storm's application for leave.

Respectfully submitted,

Pieter Van Tol

8/28/2007

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-----Original Message-----

From: Ken Feinberg [mailto:KFeinberg@thefeinberggroup.com]
Sent: Monday, February 12, 2007 10:23 AM
To: Sills, Robert L.; Van Tol, Pieter; Craig, Gregory; William R. Jentes
Subject: Attached Briefing Order

Everybody:
I attach the latest Interim Order Directing Further Briefing from the Tribunal. I believe it is self-explanatory.
Thank you.
Ken
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